

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-2213**

September 1, 2017

The Honorable Scott Pruitt  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue  
Washington, DC 20460

Dear Administrator Pruitt:

We write to request information regarding the steps the Environmental Protection Agency (EPA) is undertaking to complete its review of pesticides harmful to bees and other pollinators, in particular, the neonicotinoid class of insecticides. EPA's recent actions regarding the pesticide chlorpyrifos call into question your agency's ability to make objective, science-based decisions when it comes to commonly used and potentially harmful pesticides. We are deeply concerned that the agency is not taking into account available science when reviewing these chemicals. Given that EPA's public comment period for the review of imidacloprid, thiamethoxam, clothianidin and dinotefuran closed on July 24th, we would like to understand what steps your agency is taking to ensure public input and the full body of science is assessed when undertaking this review.

Last year, EPA scientists concluded that the agency should ban chlorpyrifos, a commonly used pesticide, on farms across the country due to significant evidence of the harmful effects it has on farmworkers and young children.<sup>1</sup> Despite the clear science and a previous ban on household uses of chlorpyrifos in 2000, your agency reversed this decision and instead chose to keep this pesticide on the market.<sup>2</sup>

The science is clear: there are no safe uses of chlorpyrifos. Prenatal exposures to this chemical is associated with reduced IQ, loss of working memory, attention disorders and delayed motor development. Wherever chlorpyrifos is sprayed, it can cause immediate and long-term health-related harms to children, farmers, farmworkers and others who are exposed.<sup>3</sup>

Since your agency reversed this decision, it has been revealed that you met privately with Dow Chemical's CEO before ignoring your own agency's recommendations to ban chlorpyrifos. Given the precedent this action has created at EPA, we are deeply concerned that your agency has adopted a new standard of pesticide review and will start making pesticide registration

<sup>1</sup> Wade Britton *et. Al.*, United States Environmental Protection Agency, Office of Chemical Safety and Pollution Prevention, *Chlorpyrifos: Revised Human Health Risk Assessment for Registration Review*.

<sup>2</sup> E. Scott Pruitt, United States Environmental Protection Agency, *Chlorpyrifos; Order Denying PANNA and NRDC's Petition to Revoke Tolerances*.

<sup>3</sup> Bouchard MF, Chevrier J, Harley KG, Kogut K, Vedar M, Calderon N, Trujillo C, Johnson C, Bradman A, Barr DB, Eskenazi B., Prenatal exposure to organophosphate pesticides and IQ in 7-year-old children. *Environ Health Perspect*, 2011 119(8): 1189-95.

determinations based on recommendations from pesticide manufacturer instead of basing agency decisions on sound, independent science.

The science is similarly clear that neonicotinoids threaten bees and other pollinators. Just last month, the largest field study ever conducted found that two of the neonicotinoids currently under review significantly harm foraging bees.<sup>4</sup> Another landmark study performed in Canada found evidence that neonicotinoids were harming bees near treated maize fields.<sup>5</sup> This study is important because it demonstrated that neonicotinoids not only damage bee health, but also expose other pollinators through nearby contaminated weeds and wildflowers, rather than the maize itself. Additional studies have raised serious concerns that neonicotinoids are appearing in human drinking water as well as important water sources for bees.<sup>6</sup> This new science, coupled with a breadth of prior research, has led both Canada and France to uphold their commitments to ban neonicotinoids. We urge the EPA to take these new studies seriously.

Pollinators are essential to our country's food production system, agricultural economy and environment. Approximately every one in three bites of food we eat comes from honey bee pollination alone.<sup>7</sup> Pollinators provide approximately \$24 billion per year to the American economy, \$15 billion of which honey bees contribute.<sup>8</sup> Many of our most important crops almost entirely rely on animals for pollination, including almonds, cranberries and apples.<sup>9</sup> We cannot afford to expose these critical pollinators to harmful chemicals.

Last year, the EPA received approximately five million comments from Americans urging the agency to take immediate action to suspend the use of neonicotinoids. For the current comment period, your agency has received over 400,000 comments regarding neonicotinoids. Given the threats to bees and other pollinators from these chemicals, we would like to clarify how the agency is taking the science and public concerns seriously and upholding its mission to protect human health and the environment.

To this end, we respectfully request that your agency respond to the following questions and provide supporting documentation by September 29, 2017:

1. How is EPA taking into account public comments and independent science during its review of clothianidin, thiamethoxam, imidacloprid and dinotefuran?
2. Given EPA's unexpected reversal of agency policy on chlorpyrifos, how can the American public ensure EPA is upholding its mission to protect human health and the environment as it reviews clothianidin, thiamethoxam, imidacloprid, and dinotefuran?

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<sup>4</sup> B.A. Woodcock *et al.*, *Country-specific effects of neonicotinoid pesticides on honey bees and wild bees*. *Science* 30 Jun 2017: Vol. 356, Issue 6345, pp. 1393-1395. DOI: 10.1126/science.aaa1190

<sup>5</sup> N. Tsvetkov *et al.*, *Chronic exposure to neonicotinoids reduces honey bee health near corn crops*. *Science* (30 Jun 2017): Vol. 356, Issue 6345, pp. 1395-1397. DOI: 10.1126/science.aam7470

<sup>6</sup> Kathryn L. Klarich *et al.*, *Occurrence of Neonicotinoid Insecticides in Finished Drinking Water and Fate During Drinking Water Treatment*, *Environmental Science and Technology Letters* 5 April 2017: Vol. 4, Issue 5, pp 168-173. DOI: 10.1021/acs.estlett.7b00081

<sup>7</sup> *Honey Bees and Colony Collapse Disorder*, USDA, Agricultural Research Service, <https://www.ars.usda.gov/oc/br/ccd/index/>.

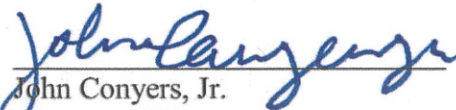
<sup>8</sup> Presidential Memorandum – Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators (June 20, 2014) [hereinafter Presidential Memorandum].

<sup>9</sup> Renee Johnson & M. Lynne Corn, Congressional Research Service, *Bee Health: Background and Issues for Congress*, 5, 7 tbl. 1 (Apr. 9, 2014)


3. How can the American public ensure EPA is not giving more weight to the manufacturers of neonicotinoids while conducting its review than independent science, human health and the environment?

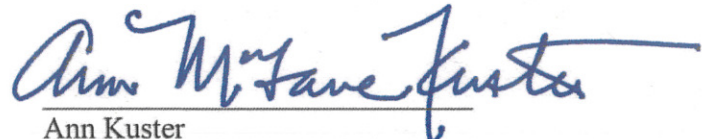
Thank for your cooperation in responding to these requests. Please contact Yvesner Zamar with Congressman Conyers at [Yvesner.Zamar@mail.house.gov](mailto:Yvesner.Zamar@mail.house.gov) or Kevin Stockert with Congressman Blumenauer at [Kevin.Stockert@mail.house.gov](mailto:Kevin.Stockert@mail.house.gov) with any questions.

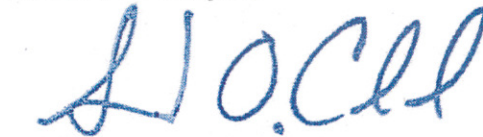
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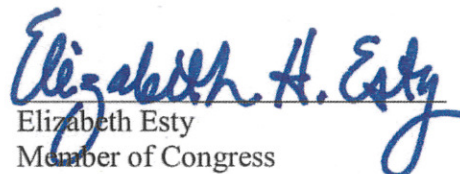
  
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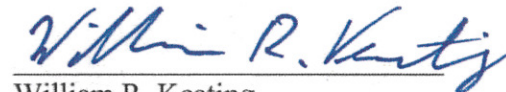
  
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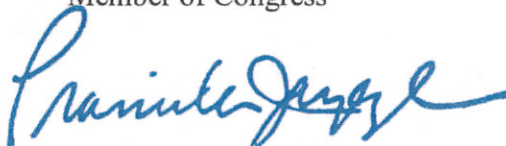
  
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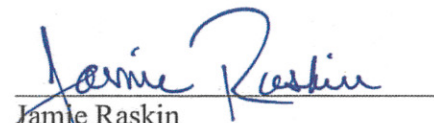
  
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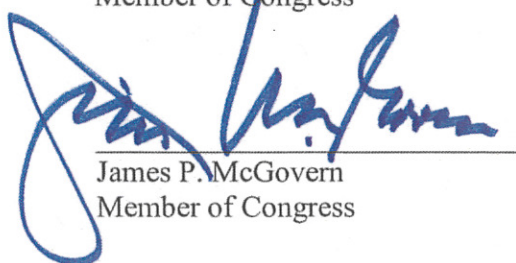
  
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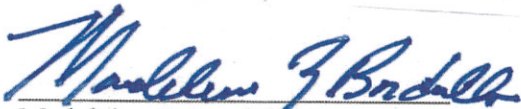
  
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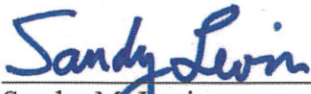




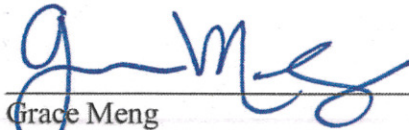
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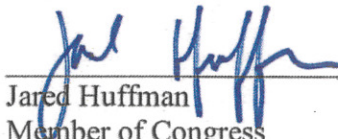
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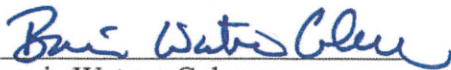
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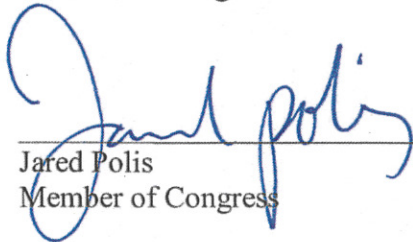
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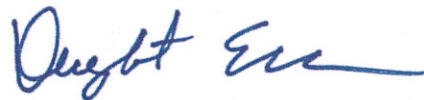
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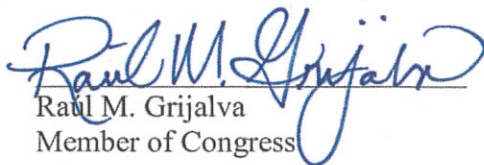
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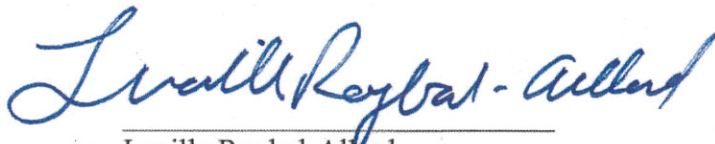
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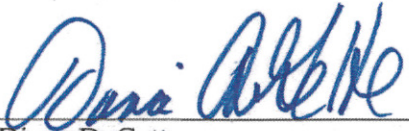
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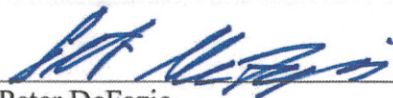
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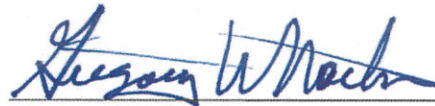
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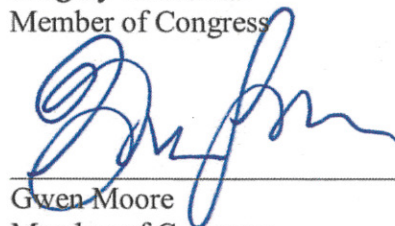
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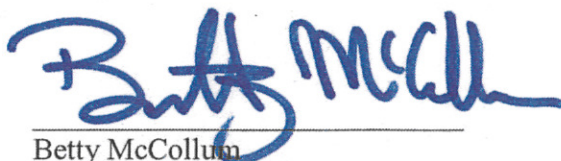
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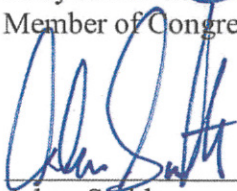
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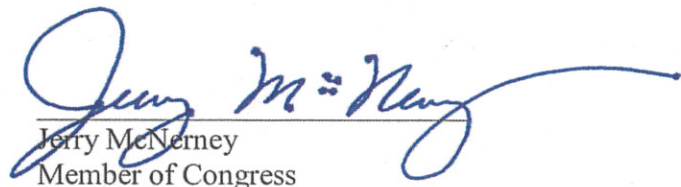
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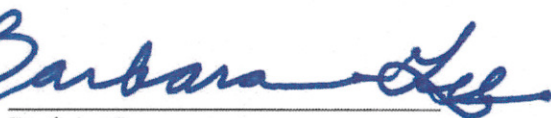
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Jerry McNerney  
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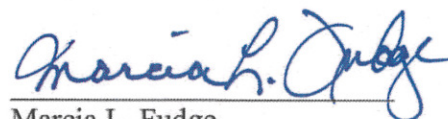
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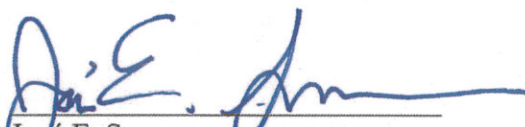
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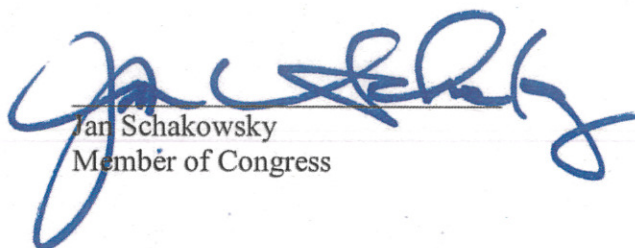
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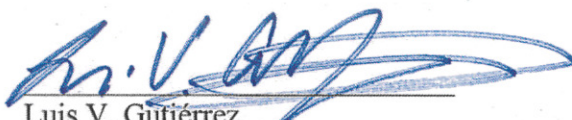
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José E. Serrano  
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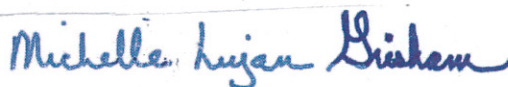
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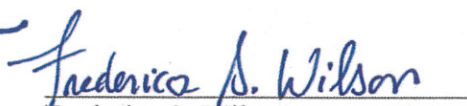
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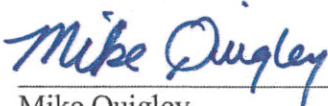
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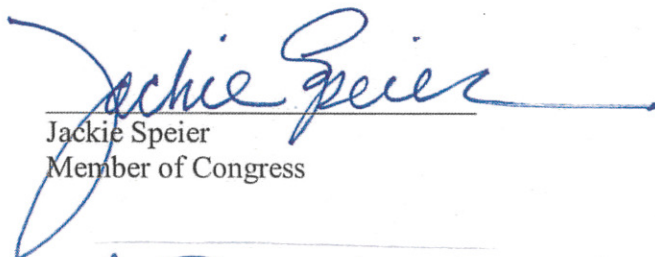
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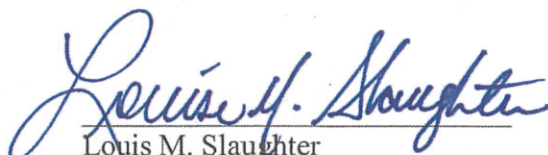
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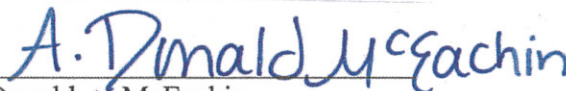
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